



Re: Ohio Rubber Company  
#02-43-0301

Mr. Edward Grant  
Ohio Rubber Company  
3911 Ben Hur Avenue  
Willoughby, Ohio 44094

February 11, 1983

US EPA RECORDS CENTER REGION 5



458838

Dear Mr. Grant:

On February 1, 1983, Melinda Merryfield-Becker and I conducted an inspection of the Ohio Rubber Company facility located at 3911 Ben Hur Avenue, Willoughby, Ohio. You, Mr. Jack McLellan, and Mr. E. Paul Robbins represented Ohio Rubber Company during this inspection. This inspection was conducted to determine compliance with both State and Federal hazardous waste regulations. A copy of the report is enclosed.

The following violations were noted during this inspection:

1. Your records included an unsigned manifest generated by your facility. A generator must submit an Exception Report to the EPA Regional Administrator if he has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility (40 CFR 262.42 and 3745-52-42). As we discussed during the inspection, this manifest will be sent back to the TSD facility for a signature. Please forward a copy of the signed manifest when it is returned to your facility.
2. The operator must have a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequencies, and responses to any process changes that may affect the character of the waste to ensure that a detailed chemical and physical analysis of the waste is obtained (40 CFR 265.13 (b) and 3745-65-13 (B)).
3. A detailed chemical and physical analysis including EP Toxicity, ignitability and a solvent analysis is necessary to ensure proper storage and disposal of the paint waste generated at your facility (40 CFR 265.13 (a) and 3745-65-13 (A)). These tests may need to be performed on a more frequent basis due to the variability noted for total metals in different batches. Please forward copies of the tests upon completion.
4. The owner or operator must develop and follow a written schedule for inspecting all safety and emergency equipment, security devices, and operating and structural equipment. This schedule must identify types of problems which are to be looked for, frequency of inspections and remedial actions need to remedy problems. Loading areas are to be inspected daily when in use (40 CFR 265.15 (b) and 3745-65-15 (B)). Please forward a copy of one of your weekly inspection report forms for review.



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The #2 waste, generated from the pretreatment of process waste waters is stored underground in a 2,200 gallon tank. This waste is defined as a sludge by 40 CFR 260.10 and is therefore subject to storage, transportation and manifest requirements even though it is being recycled. (See Figure 3, 40 CFR 260) The 2,200 gallon storage tank should be included in your Hazardous Waste Installation and Operation permit. The D001 waste should be manifested to a permitted TSD facility.

The #3 waste, wash water from paint operations, is not currently being handled as a hazardous waste. However, more analytical data is needed to verify the non-hazardous designation. Specifically, EP Toxicity analysis, and ignitability determination. Currently, this waste is stored in drums on-site.

The #5 waste, chromic acid from a chromating is corrosive and possibly EP Toxic for chrome. The sludge generated from the treatment of this waste stream is a F006 listed waste. However, Ohio Rubber does not treat this waste. It is shipped off-site for treatment.

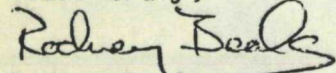
Please consider the above comments when revising your permit modification request. All of these wastes could be stored in drums or tanks on-site. Only wastes #2 and #3 were being stored at the time of the inspection. T04 should be delisted from pg. 3 of the permit application since Ohio Rubber does no treatment on-site. The reduction of quantities of U226 wastes from 16,000 gallons to 4,000 gallons must be justified in the modification request. Also, U013, asbestos has been delisted by U.S. EPA and should be delisted in the modification request.

Upon completion of the permit modification application by your facility, forward one complete copy to both Ms. Peggy J. Vince, Executive Director, HWFAB, P.O. Box 1049, 361 East Broad Street, Columbus, Ohio 43216, and the U.S. EPA. Also please forward a copy to the Northeast District Office, Ohio EPA, for our files.

This facility will be reinspected within 60 days to determine compliance with the above violations.

This inspection report will become a part of the official records of the Ohio Environmental Protection Agency's Division of Hazardous Materials Management and will also be forwarded to Ms. Kathy Homer, U.S. EPA - Region V. If any questions or problems arise, please feel free to contact me or Ms. Homer of the U.S. EPA at (312) 866-7435.

Yours truly,



Rodney Beals  
Environmental Scientist  
Division of Hazardous Materials Management  
Northeast District Office

RB:km

Enclosure

cc: Paula Cotter, DHMM, Central Office  
Ken Westlake, U.S. EPA - Region V  
Jack McLellan, Ohio Rubber Company  
Karen Heyob, DHMM, Central Office w/out enclosure